

In Lieu Of Services And Settings (ILOS)

Member Town Hall June 05, 2025

Provider Town Hall June 19, 2025



Health and
Human Services



Topics

- ▶ Defining In Lieu Of Services and Settings (ILOS)
- ▶ Purpose of ILOS
- ▶ Requirements of ILOS
- ▶ Iowa's ILOS
 - ▶ 15-day IMD Stay
 - ▶ HCBS while on HCBS waiver waitlists
- ▶ Effective date, assessments billing.
- ▶ MCO ILOS Processes
 - ▶ Iowa Total Care
 - ▶ Molina
 - ▶ Wellpoint

In Lieu of Services (ILOS)

- ▶ Provided by the MCOs in lieu of a service or setting (ILOS) covered under the Medicaid State Plan.
- ▶ Used, at the option of the managed care plan and the enrollee.
- ▶ Used as an immediate or longer-term substitutes for state plan-covered services or settings.
- ▶ Used when the ILOSs can be expected to reduce or obviate the future need to utilize state plan-covered services or settings.



ILOS Goals

Help	Help address many of the unmet physical, behavioral, developmental, long-term care needs
Improve	Improve health outcomes
Facilitate	Facilitate greater access to care for home and community-based services
Prevent or delay	Prevent or delay enrollees' need for acute or institutional care



Six Principles of ILOS

Must advance the objectives of the Medicaid program

Must be cost effective

Must be medically appropriate

Must be provided in a manner that preserves enrollee rights and protections

Must be subject to appropriate monitoring and oversight

Must be subject to retrospective evaluation, when applicable

ILOS

- ▶ States must determine that the ILOS is a medically appropriate and cost-effective substitute for covered services or settings under the state plan.
- ▶ Enrollees cannot be required to use the ILOS.
- ▶ ILOS must be authorized and identified in the managed care plan contract and must be offered to enrollees at the option of the managed care plan.
- ▶ The utilization and actual cost of the ILOS is considered in developing the component of the capitation rates that represents the covered state plan services.
- ▶ CMS must approve the rate certification including the projected ILOS cost percentage.
- ▶ The projected and final ILOS cost percentage may not exceed five percent.
- ▶ State will perform ongoing and robust monitoring and oversight activities.

Iowa Medicaid ILOS | 15-Day IMD Stay

- ▶ FFP is not available for any medical assistance under Title XIX for services provided to an individual, aged 21 to 64, who is a patient in an Institution for Mental Disease (IMD) facility.
- ▶ ILOS allows short-term inpatient mental health or substance use disorder treatment in an IMD.
- ▶ Limited to 15 days per capitation period.
- ▶ Medically appropriate, cost effective, and at the option of the enrollee and managed care plan.
- ▶ 2016 Medicaid and CHIP final rule (see 81 FR 27555-27563).
- ▶ 42 CFR §§ 438.3(e)(2), 438.6(e), and 438.66.

Iowa Medicaid ILOS | HCBS while on waitlists

- ▶ Services while waiting for HCBS waiver funding slot.
- ▶ Available to MCO enrollees on the HCBS waiver waitlists.
- ▶ Referred by MCO care managers or self-referral.
- ▶ Standardized assessment tool to identify need for services.
- ▶ Medically necessary to avoid acute care or imminent institutionalization.

HCBS while on waitlists

- ▶ Housing Supports Services
- ▶ Home Modifications
- ▶ Vehicle Modifications
- ▶ Case Management
- ▶ Respite Care Services
- ▶ Personal Care Services
- ▶ Medically Tailored Meals (MTM)
- ▶ Intermittent Supported Community Living Services (SCL)
- ▶ Non-Medical Transportation including to conduct personal business essential to the health and welfare of the member
- ▶ Personal Emergency Response System
- ▶ Specialized Medical Equipment
- ▶ Adult Day Care

Other Information



► **ILOS Effective Date:** July 2024

► **ILOS Billing:** ILOS billing will use HCBS waiver service procedure codes with the **SC** modifier. There will **NOT be client participation** withheld from the payment of ILOS services

► **ILOS Excluded Populations:** Medicaid members receiving services through a limited benefit group, such as the Iowa Health and Wellness Plan (IHAWP) or Hawki, are not eligible for ILOS.

ILOS Assessment and Eligibility

- ▶ ILOS require the completion of an In Lieu of Services Needs Assessment (ILOSNA) tool, administer by the MCO case manager.
- ▶ ILOS are used when the services are expected to reduce or avoid the future need to utilize state plan covered services or settings.
- ▶ Needed services are obtained by enrolled Medicaid providers.

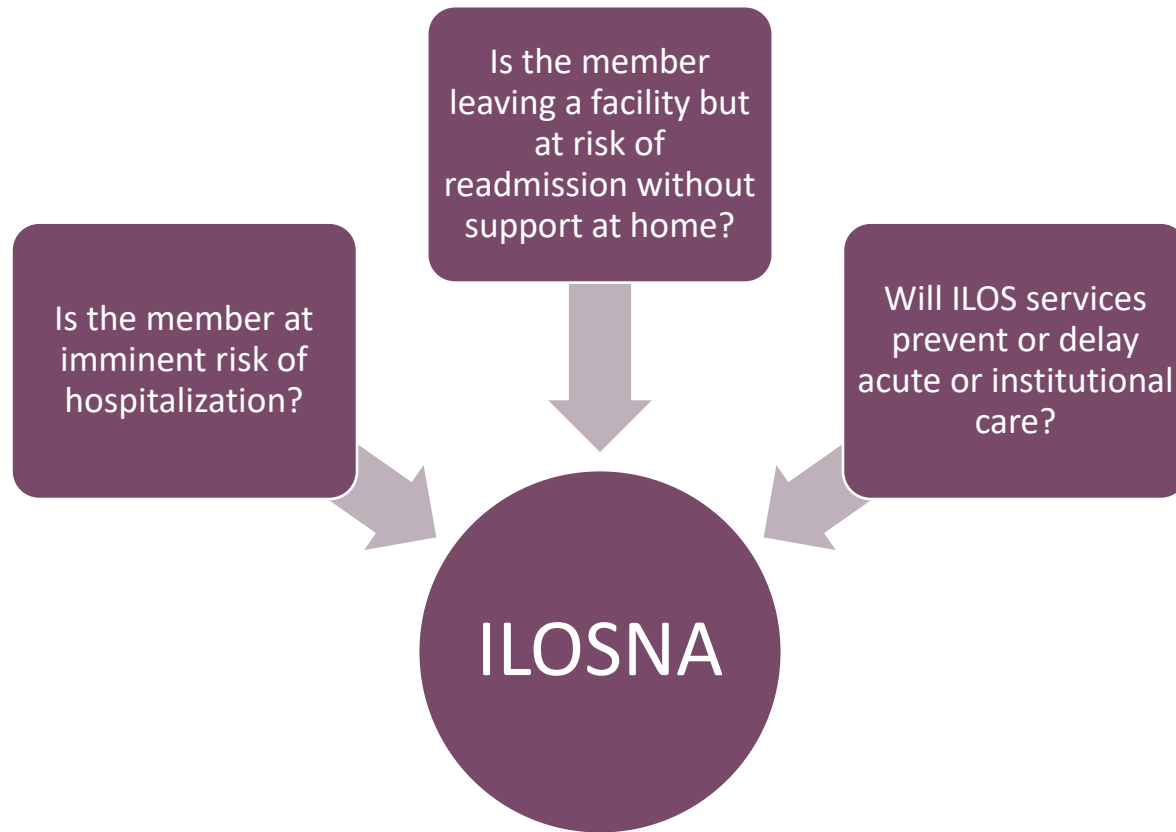
ILOS Assessment and Eligibility p.2

- ▶ ILOS are not available through the Consumer Choices Option (CCO) program.
- ▶ ILOS services are not available, in whole or part, to a member in the time frame for which they are actively on any HCBS waiver.
 - ▶ For example, medically tailored meals via the ILOS benefit could not be used to supplement a member who is currently on an HCBS waiver that does not support home delivered meals.

Molina Healthcare Iowa Inc.

In Lieu of Services - ILOS

Screening Process for ILOS



ILOS Assessment and Eligibility

ILOS requires the completion of an In Lieu of Services Needs Assessment (ILOSNA) tool

- ❖ ILOSNA is an Iowa HHS Standardized Assessment Tool
- ❖ Administered by Molina ILOS Case Manager
- ❖ ILOS are used when the services are expected to reduce or avoid the future need to utilize state plan covered services or settings.
- ❖ Needed services are obtained by enrolled Medicaid (HCBS) providers.
- ❖ ILOS are not available through the Consumer Choices Option (CCO) program.

Services Available under ILOS

Housing Supports Services

Home Modifications

Vehicle modifications

Case management

Respite care services

Personal care services

Medically Tailored Meals (MTM)

Intermittent Supported Community Living Services (SCL)

Supported Employment Services (SE)

Adult Day Care

Non-Medical Transportation including to conduct personal business essential to the health and welfare of the member

Personal Emergency Response System

Specialized Medical Equipment

Referral or Additional Questions?



1-844-236-0894



iaproviderrelations@molinahealthcare.com



<https://www.molinahealthcare.com/providers/ia/medicaid/home.aspx>

Members > Learn More > Helpful Resources > Member Resources

[Member Resources | Medicaid](#)

Appendix

Iowa HHS Informational Letter No. 2620-MC-FFS

<https://hhs.iowa.gov/media/15815/download?inline>

Iowa HHS ILOS

https://www.google.com/url?client=internal-element-cse&cx=c61165a9059c041a5&q=https://hhs.iowa.gov/media/14166/download%3Finline&sa=U&ved=2ahUKEwjMls-BqcmNAxW148kDHYqSEJwQFnoECAQQAg&usg=AOvVaw3JYaak_0zDiewp88ZAOtRM

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[Member Resources | Medicaid](#)



In Lieu of Services (ILOS)

June 2025 Townhalls

Stephanie Perry, LTSS Senior Director

Iowa Total Care ILOS Overview

Waitlist team helps to identify members who may be at risk of institutionalization:

- ILOS Needs Assessment
- Members are identified through:
 - Waitlist outreach
 - Providers
 - Regions/ASO/ADRCs
 - Hospital Staff
 - Internal Iowa Total Care departments
- Members who are identified as needing ILOS will be assigned an ILOS case manager.

ILOS Case Manager Responsibilities

Member Outreach

- Direct outreach to the member
- Determining what needs could benefit from ILOS
- Review of community resource options
- Completes a priority needs assessment

ILOS NA

- Completes the ILOS standardized assessment when necessary
- Gather additional documentation to support the need for ILOS
- Present ILOS that may benefit the member to our internal medical rounds team
- Develop an ILOS service plan with the member for approved services

ILOS Case Manager Responsibilities

ILOS Management

- Monthly touchpoints with the member
- Every other month outreach to the ILOS provider(s)
- Continue to assist the member through the waitlist process

Waiver Eligibility

- Complete a warm hand off to the waiver case manager once member is approved for waiver
 - Introduction between member and new case manager
 - Discuss transition with current ILOS providers
 - Transition meeting between ILOS case manager and waiver case manager

ILOS Data

28 ILOS requests since implementation

Current ILOS

2 members have accessed ILOS

Services Accessed through ILOS



*Home
Delivered
Meals*



PERS

ITC ILOS Facts

Majority of ILOS referrals have been from the MHDS regions

Most member needs have been met by other community resources

ITC has connected 6 members to Habilitation services through the ILOS process

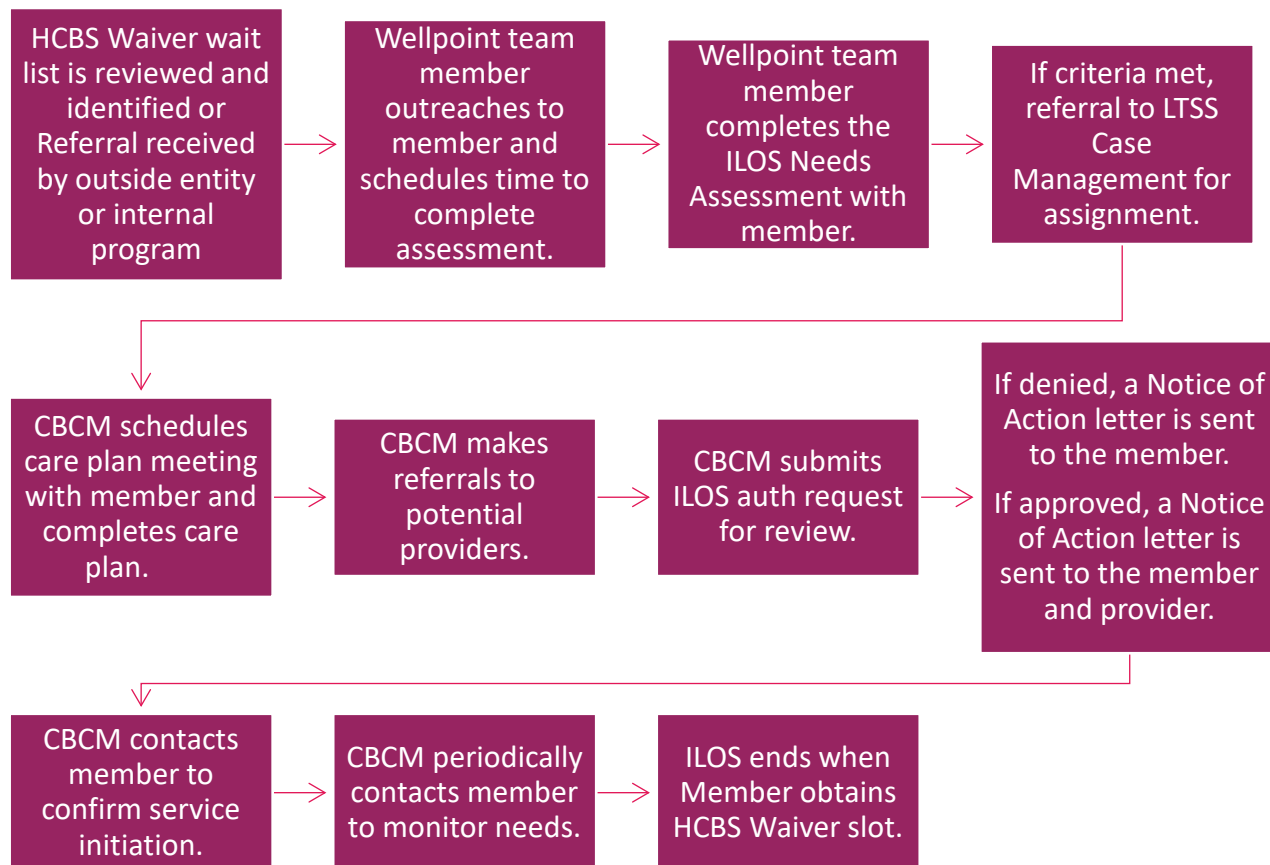
The majority of the ILOS referrals are for members on the HD waiver waitlist.

Priority Needs Assessment are completed on all ILOS members who meet the criteria

Helpful Links/Contacts

- <https://www.iowatotalcare.com/providers/resources/ilos.html>
- <https://www.iowatotalcare.com/members/medicaid/resources/ilos.html>
- <https://www.iowatotalcare.com/territory-maps.html>
- Phone: [1-833-404-1061](tel:1-833-404-1061) (TTY: [711](tel:711))
- Email: ITC_Eligibility@IowaTotalCare.com

Wellpoint's Process to Access ILOS



Wellpoint's ILOS Trends

2024

40 Referrals for ILOS

- 17 - Approved
- 23 - Denied
- Denial Reasons
 - Member unable to contact (3 attempts) – 7
 - Other funding available - 5
 - Already on a waiver program – 6
 - No immediate danger or referral to PH/BH more appropriate – 5

2025

25 Referrals for ILOS

- 11 – Approved
- 14 – Denied
- Denial Reasons
 - Member unable to contact (3 attempts) – 4
 - Other funding available - 2
 - Already on a waiver program – 2
 - No immediate danger or referral to PH/BH more appropriate – 2
 - Member declined ILOS when contacted – 2
 - Criteria not met - 2



MCO Contact

► Iowa Total Care:

- Phone: 1-833-404-1061
- Email: providerrelations@iowatotalcare.com
- Website: <https://www.iowatotalcare.com>

► Molina Healthcare of Iowa:

- Phone: 1-844-236-1464
- Email: iaproviderrelations@molinahealthcare.com
- Website: <https://www.molinahealthcare.com/providers/ia/medicaid/home.aspx>

► Wellpoint Iowa, Inc.

- Phone: 1-833-731-2143
- Email: ProviderSolutionsIA@wellpoint.com
- Website: <https://www.provider.wellpoint.com/iowa-provider/home>



Questions

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